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**From:** Jeffrey R Marcell (Generation - 3) [/O=DOMINION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=JEFF136]  
**Sent:** 10/21/2015 7:31:20 AM  
**To:** Dana West (Generation - 3) [/O=DOMINION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DANA0608a5]  
**CC:** Barbara Monteiro (Generation - 3) [/O=DOMINION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Barba19]  
**Subject:** FW: Coal Ash VPDES Provisions

Dana,

Please review the proposed language below.

We (Dominion Environmental) are negotiating and fine tuning this language, it should only change slightly.

Changes we are asking for are: the ash pond dewatering condition only apply when discharging to state water, not moving from D Pond to E Pond, for example, regardless of how we move it there; and, the SWPPP condition only applies when the ash pond project is active, once the project is completed the language would disappear.

Barbara, please review for awareness.

Thanks.

Jeff Marcell

Environmental Supervisor

Possum Point Power Station

Ladysmith & Remington CT Sites

703-441-3813 (phone)

8-795-3813 (tie)

**From:** Kenneth Roller (Services - 6)  
**Sent:** Monday, October 19, 2015 8:10 AM  
**To:** Jeffrey R Marcell (Generation - 3); Ian A Whitlock (Services - 6)  
**Subject:** FW: Coal Ash VPDES Provisions

Jeff and Ian,

Please review the Ash Pond Stormwater Management Special Condition that DEQ has developed for inclusion in the permits. Do you have any concerns with these requirements?

Ken

**From:** Brockenbrough, Allan (DEQ) [<mailto:Allan.Brockenbrough@deg.virginia.gov>]  
**Sent:** Friday, October 16, 2015 1:05 PM  
**To:** Kenneth Roller (Services - 6)  
**Subject:** Coal Ash VPDES Provisions

Ken-

In our meeting last Friday we agreed to provide Dominion with updates for two provisions in the proposed VPDES permits.

1. Distinguishing between decanting and dewatering and identifying when the additional limitations apply
2. Language to address concerns with stormwater runoff from haul routes, loading areas, etc.

The following language is not final but should be close to what we include in the draft permits.....

Ash Pond Decanting/Dewatering Special Condition

*The permittee shall notify the DEQ Regional Office upon commencing operations to draw down the water elevation in the ash pond in preparation of pond closure. Water decanted by gravity from the pond surface shall be released at a controlled rate not to exceed one foot of pond surface elevation per day to minimize the discharge of any solids. An effluent grab sample for Total Suspended Solids (TSS) shall be taken and analyzed daily once the draw down process commences and shall continue until the limits in Part I. B become effective.. Upon either (a) obtaining a TSS sample greater than or equal to 30 mg/l, (b) use of non-gravity methods or hydraulic pumping of the pond water, (c) altering the surface of the settled ash through trenching, boring, or other mechanical means to facilitate dewatering, or (d) the use of an on-site treatment unit, the monitoring requirements and effluent limits in Part I.B. of this permit shall become effective and remain effective until the closure process is complete. The permittee shall provide written notification to the DEQ Regional Office no later than 24 hours following meeting the first occurrence of any of provisions (a) through (d) of this special condition.*

Ash Pond Closure Stormwater Management Special Condition

*Best management practices (BMPs), structural and/or non-structural, shall be utilized by the permittee to minimize the impact of ash pond closure activities on stormwater quality. Ash pond closure activities may include, but are not limited to, the process of ash movement for off-site disposal, ash loading and unloading areas, any area(s) associated with the storage of ash prior to transport off-site, and vehicle tracking associated with the movement of ash.*

*The facility's Stormwater Pollution Prevention Plan (SWPPP)/O&M Manual (if the IP has stormwater language in it already we could just update the SWPPPP / if no stormwater language, add it to the O&M?) shall include a description of the BMPs being implemented and a regular schedule for preventive maintenance of all BMPs where appropriate. All structural BMPs identified in the SWPPP/O&M shall be maintained in effective operating condition and shall be inspected for structural integrity and operational efficiency once per week during ash pond closure activities. Results of the weekly inspections and actions needed and performed in response to the weekly inspections shall be documented per the SWPPP/O&M Manual.*

Please feel free to give me a call with any comments

Allan

Allan Brockenbrough, II, P.E.

DEQ - Office of VPDES Permits

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